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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	Case No. 18-CR-00258 EJD
	)	
Plaintiff,	)	ADMINISTRATIVE MOTION TO FILE
	)	PORTIONS OF DOCUMENTS UNDER SEAL
v.	)	AND [PROPOSED] ORDER
	)	
ELIZABETH HOLMES and RAMESH	)	
"SUNNY" BALWANI,	)	
	)	
Defendants.	)	

**NOTICE OF MOTION AND ADMINISTRATIVE MOTION**

Pursuant to Local Rule of Criminal Procedure 56-1, the United States respectfully moves for an order permitting the filing under seal of unredacted versions of the following documents:

1	UNITED STATES' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS SECOND AND THIRD SUPERSEDING INDICTMENTS BASED ON PRE-INDICTMENT DELAY
2	SEPTEMBER 18, 2020 DECLARATION OF AUSA ROBERT S. LEACH IN SUPPORT OF UNITED STATES' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS SECOND AND THIRD SUPERSEDING INDICTMENTS BASED ON PRE-INDICTMENT DELAY

3	EXHIBIT C TO SEPTEMBER 18, 2020 DECLARATION OF AUSA ROBERT S. LEACH IN SUPPORT OF UNITED STATES' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS SECOND AND THIRD SUPERSEDING INDICTMENTS BASED ON PRE-INDICTMENT DELAY
4	EXHIBIT D TO SEPTEMBER 18, 2020 DECLARATION OF AUSA ROBERT S. LEACH IN SUPPORT OF UNITED STATES' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS SECOND AND THIRD SUPERSEDING INDICTMENTS BASED ON PRE-INDICTMENT DELAY

Sealing is appropriate because the opposition and the declaration refer to and/or attach documents that are themselves sealed. Redacted versions omitting references to the sealed documents are being publicly filed.

For these reasons, the government submits there is good cause to grant sealing.

DATED: September 18, 2020

Respectfully submitted,

ADAM A. REEVES  
Attorney for the United States,  
Acting Under Authority Conferred By 28  
U.S.C. § 515

/s/

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ROBERT S. LEACH  
Assistant United States Attorney

**[PROPOSED] ORDER**

The Court, having considered the government's Administrative Motion, hereby GRANTS the motion and ORDERS that unredacted versions of the following documents shall be filed under seal:

1	UNITED STATES' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS SECOND AND THIRD SUPERSEDING INDICTMENTS BASED ON PRE-INDICTMENT DELAY
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IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE EDWARD J. DAVILA  
UNITED STATES DISTRICT JUDGE